

1 David N. Chandler, Sr. SBN 60780
David N. Chandler, Jr. SBN 235427
2 DAVID N. CHANDLER, p.c.
1747 Fourth Street
3 Santa Rosa, CA 95404
Telephone: (707) 528-4331

4 Attorneys for Debtor
5

6 UNITED STATES BANKRUPTCY COURT
7 NORTHERN DISTRICT OF CALIFORNIA

8 IN RE: CASE No. 10-11533

9 NAVJOT, LLC, CHAPTER 11

10 DEBTOR. /

APPLICATION FOR ORDER AUTHORIZING
11 EMPLOYMENT OF SPECIAL COUNSEL;
DECLARATION OF ALBERT E. CORDOVA;
12 DECLARATION OF DAVID N. CHANDLER

13 The Application of Navjot, LLC, Debtor herein, respectfully
14 represents:

15 1. The within case was filed under Chapter 11 of the
16 Bankruptcy Code.

17 2. Applicant requires the assistance of counsel who has some
18 expertise in Civil Litigation matters, and is knowledgeable
19 regarding the claims against Kirt Menon and the Counter Claims of
20 Mr. Menon.

21 3. Attorney Albert E. Cordova is already familiar with many
22 aspects of the relationship between Kirt Menon and the Debtor. It
23 is in the interest of the estate to utilize that knowledge and
24 maintain the momentum in the matter.

25 4. Applicant has consulted with Albert E. Cordova, Law
26 Offices of Albert E. Cordova, 1101 Fifth Avenue, Suite 200, San
27 Rafael, CA 94901 and desire to retain Mr. Cordova and his firm as
28 special counsel for the limited purpose of representing Debtor and

1 assisting general counsel for Debtor as regards claims and counter
2 claims of Kirt Menon.

3 5. The Debtor desires to retain and employ the Law Offices of
4 Albert E. Cordova to render such advice and perform such services as
5 are required at the direction of general counsel and which desirable
6 and necessary in the administration of this estate.

7 6. The hourly rate for Albert E. Cordova is \$325.00.

8 7. Albert E. Cordova has indicated his willingness to act at
9 the direction of general counsel.

10 8. To the best of Applicant's knowledge, Albert E. Cordova,
11 Law Offices of Albert E. Cordova does not have any connection with
12 the Debtor, the creditors, or any other party in interest, or their
13 respective attorneys or accountants, the United States Trustee or
14 any person employed in the office of the United States Trustee, and
15 represents no interest adverse to the estate in the matters upon
16 which he is to be retained, except as represented in the Declaration
17 of Albert E. Cordova.

18 WHEREFORE, it is respectfully requested that Debtor be
19 authorized to employ Albert E. Cordova, Law Offices of Albert E.
20 Cordova, under a general retainer fee agreement based upon
21 applicable hourly rates, to provide such advice and counsel as
22 special counsel in the aforementioned action, on the terms and
23 restrictions set forth above.

24

25 Dated: 8/17/10

DAVID N. CHANDLER, p.c.

26

27

By: /s/ David N. Chandler

28

DAVID N. CHANDLER,
Attorney for Debtors

3. That certain issues require the assistance of special counsel in areas in which I have little foreknowledge. Special counsel must be consulted with to identify and potentially resolve effectively.

4. The Debtor has consulted with Albert E. Cordova, Law Offices of Albert E. Cordova, and desires to retain Mr. Cordova as special counsel in the case to consult with me regarding certain civil litigation issues related to the within case.

5. I have spoken with Mr. Cordova and have not been able to identify any connections with the estate, the debtor or creditors other than those identified in his Declaration. He appears to be disinterested.

Executed under penalty of perjury this 17TH day of August, 2010
at Santa Rosa, California.

/s/ David N. Chandler
David N. Chandler